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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSANA CASTANEDA

Plaintiff,

vs.

CAROLYN W. COLVIN,
Acting Commissioner of
Social Security,

Defendant.

CIVIL NO. 4:14-cv-05515-JSW

STIPULATION & ~~PROPOSED~~ ORDER
FOR A 14-DAY EXTENSION FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 14 days to respond to Plaintiff's motion for summary judgment. The current due date is September 1, 2015. The new due date will be September 15, 2015.

Defendant respectfully requests this additional time because Defendant's counsel is managing a heavy caseload. Defendant's counsel is currently responsible for managing and briefing forty-three other matters pending before the District Courts. Counsel is also in the process of completing a ninth circuit appellate brief, which must be reviewed by the Office of General Counsel and the United States

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Department of Justice (DOJ). In addition, counsel is representing the agency in a federal employment discrimination case and is in the process of gathering and serving documents for discovery.

This request is made in good faith with no intention to unduly delay the proceedings.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Counsel apologizes to the Court for any inconvenience caused by this delay.

Respectfully submitted,

Dated: August 28, 2015

/s/ Barbara Mann by Chantal R. Jenkins*
As authorized via email on August 28, 2015
Barbara Mann
Attorney for Plaintiff

Respectfully submitted,

MELINDA L. HAAG
United States Attorney

Dated: August 28, 2015

/s/ Chantal R. Jenkins
Chantal R. Jenkins
Special Assistant United States Attorney

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August 28, 2015


HON. JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

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